

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel, W.A. DREW EDMONDSON, in his capacity as ATTORNEY GENERAL OF THE STATE OF OKLAHOMA and OKLAHOMA SECRETARY OF THE ENVIRONMENT C. MILES TOLBERT, in his capacity as the TRUSTEE FOR NATURAL RESOURCES FOR THE STATE OF OKLAHOMA,

Plaintiff,

v.

Case No. 4:05-CV-329-JOE-SAJ

TYSON FOODS, INC.; TYSON POULTRY, INC.; TYSON CHICKEN, INC.; COBB-VANTRESS, INC.; AVIAGEN, INC.; CAL-MAINE FOODS, INC.; CAL-MAINE FARMS, INC.; CARGILL, INC.; CARGILL TURKEY PRODUCTION, LLC.; GEORGE'S, INC.; GEORGE'S FARMS, INC.; PETERSON FARMS, INC.; SIMMONS FOODS, INC.; and WILLOW BROOK FOODS, INC.,

Defendants.

**SPECIAL ENTRY OF APPEARANCE**

To the Clerk of this Court and all parties of record:

Without waiving any positions or defenses and/or objections to jurisdiction or venue, please enter my appearance as counsel in this case for Cargill, Inc. and Cargill Turkey Production, LLC.

Respectfully submitted,

s/ Terry W. West

TERRY W. WEST, OBA # 9496

The West Law Firm

124 W. Highland – P.O. Box 698

Shawnee, Oklahoma 74802-0698

Telephone: (405) 275-0040

Facsimile: (405) 275-0052

E-Mail: [terry@thewestlawfirm.com](mailto:terry@thewestlawfirm.com)

ATTORNEYS FOR CARGILL, INC. AND  
CARGILL TURKEY PRODUCTION, LLC

**CERTIFICATE OF SERVICE**

I certify that on the 10<sup>th</sup> day of October, 2005, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

**COUNSEL FOR PLAINTIFFS:**

W.A. Drew Edmondson, OBA #2628  
[drew\\_edmondson@oag.state.ok.us](mailto:drew_edmondson@oag.state.ok.us);  
[suzy\\_thrash@oag.stat.ok.us](mailto:suzy_thrash@oag.stat.ok.us)  
2300 North Lincoln Boulevard, Suite 112  
Oklahoma City, OK 73105  
and  
M. David Riggs, OBA #7583  
[driggs@riggsabney.com](mailto:driggs@riggsabney.com)  
Richard T. Garren, OBA #3253  
[rgarren@riggsabney.com](mailto:rgarren@riggsabney.com)  
Sharon K. Weaver, OBA #19010  
[sweaver@riggsabney.com](mailto:sweaver@riggsabney.com)  
Douglas A. Wilson, OBA #13128  
[doug\\_wilson@riggsabney.com](mailto:doug_wilson@riggsabney.com)  
Riggs Abney Neal Turpen Orbison & Lewis  
502 W. 6th Street  
P.O. Box 1046  
Tulsa, OK 74101  
and  
Robert A. Nance, OBA #6581  
[rnance@ribbsabney.com](mailto:rnance@ribbsabney.com)  
D. Sharon Gentry, OBA #15641  
[sgentry@riggsabney.com](mailto:sgentry@riggsabney.com)  
Riggs Abney Neal Turpen Orbison & Lewis  
5801 Broadway Extension, Suite 101  
Oklahoma City, OK 73118  
and  
Louis W. Bullock, OBA #1305  
[lbullock@mkblaw.net](mailto:lbullock@mkblaw.net)  
J. Randall Miller, OBA #6214  
[rmiller@mkblaw.net](mailto:rmiller@mkblaw.net)  
David P. Page, OBA #6852  
[davidpage@mkblaw.net](mailto:davidpage@mkblaw.net)  
Miller, Keffer & Bullock, PC  
222 South Kenosha  
Tulsa, OK 74120

**COUNSEL FOR PETERSON FARMS, INC.:**

A. Scott McDaniel, OBA #16460  
[smcdaniel@jpm-law.com](mailto:smcdaniel@jpm-law.com)  
Chris A. Paul, OBA #14416  
[cpaul@jpm-law.com](mailto:cpaul@jpm-law.com)  
Nicole M. Longwell, OBA #18771  
[nlongwell@jpm-law.com](mailto:nlongwell@jpm-law.com)  
Philip D. Hixon, OBA #19121  
[phixon@jpm-law.com](mailto:phixon@jpm-law.com)  
Martin A. Brown, OBA #18660  
[mbrown@jpm-law.com](mailto:mbrown@jpm-law.com)  
Joyce, Paul & McDaniel, PC  
1717 South Boulder Ave., Suite 200  
Tulsa, OK 74119

**COUNSEL FOR TYSON FOODS, INC.; TYSON  
POULTRY, INC.; TYSON CHICKEN, INC.;  
AND COBB-VANTRESS, INC.:**

Patrick M. Ryan, OBA #7864  
[pryan@ryanwhaley.com](mailto:pryan@ryanwhaley.com)  
Stephen L. Jantzen, OBA #16247  
[sjantzen@ryanwhaley.com](mailto:sjantzen@ryanwhaley.com)  
Ryan, Whaley & Coldiron, PC  
119 N. Robinson  
900 Robinson Renaissance  
Oklahoma City, OK 73102

**COUNSEL FOR WILLOW BROOK FOODS,  
INC.:**

R. Thomas Lay, OBA #5297  
Kerr, Irvine, Rhodes & Ables  
201 Robert S. Kerr Ave., Suite 600  
Oklahoma City, OK 73102  
[rtl@kiralaw.com](mailto:rtl@kiralaw.com)

I also hereby certify that I served the attached document by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

Elizabeth C. Ward  
Frederick C. Baker  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464

and

William H. Narwold  
Motley Rice LLC  
20 Church St., 17<sup>th</sup> Floor  
Hartford, CT 06103

and

C. Miles Tolbert  
Secretary of the Environment  
State of Oklahoma  
3800 North Classen  
Oklahoma City, OK 73118

s/ Terry W. West